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11 *Otto Trucking LLC*

12 **UNITED STATES DISTRICT COURT**
13 **NORTHERN DISTRICT OF CALIFORNIA**
14 **SAN FRANCISCO DIVISION**

15 WAYMO LLC,

16 Plaintiff,

17 v.

18 UBER TECHNOLOGIES, INC.;
19 OTTOMOTTO LLC; OTTO TRUCKING
LLC,

20 Defendants.
21

Case No. 3:17-cv-00939-WHA

**DECLARATION OF NON-PARTY LIOR
RON IN SUPPORT OF OPPOSITION TO
MOTION TO COMPEL (DKT. NO. 682)**

1 I, LIOR RON, declare as follows:

- 2 1. I have personal knowledge of the matters set forth in this declaration and, if called to testify
3 as a witness, I could and would testify competently under oath to the matters set forth herein.
4 This declaration is submitted in support of Otto Trucking's Opposition to Waymo LLC's
5 Letter Brief In Support of Waymo LLC's Motion to Compel Against Defendant Otto
6 Trucking LLC and Defendants Uber Technologies, Inc. and Ottomotto LLC (Dkt. No. 682)
7 filed concurrently herewith.
8
- 9 2. I am currently a Senior Director at Uber Technologies, Inc. ("Uber"). In 2016, I was a
10 founding member of Ottomotto LLC ("Otto"). I am one of two managing members of Otto
11 Trucking LLC ("Otto Trucking").
12
- 13 3. Anthony Levandowski is the other Managing Member of Otto Trucking and also its
14 executive chairman. Adam Bentley is Legal Counsel of Otto Trucking. Rhian Morgan is
15 Secretary of Otto Trucking.
- 16 4. I am knowledgeable about information concerning the operations and corporate affairs of
17 Otto Trucking. I am involved in the day to day operations of Otto Trucking. Mr.
18 Levandowski has not been involved in the day to day activities since leaving Uber. Since
19 leaving Uber, he has not been as involved in Otto Trucking as I have been and does not have
20 the level of knowledge of Otto Trucking's activities that I do.
21
- 22 5. Otto Trucking is an entity that exists separate from Uber. Uber is not a shareholder in Otto
23 Trucking, although Uber does have the right to purchase Otto Trucking.
- 24 6. As to its day to day operations, Otto Trucking has no employees. It has no servers and no
25 networks. Otto Trucking has never issued any electronic communications device, including
26 any such device to either Anthony Levandowski or to myself.
27
28

1 I declare under penalty of perjury, under the laws of the United States of America, that the
2 foregoing is true and correct. Executed this 27th day of June 2017, in San Francisco,
3 California.
4

5 /s/ Lior Ron
6 Lior Ron
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ATTESTATION

I, Neel Chatterjee, am the ECF user whose username and password are being used to file the above DECLARATION OF NON-PARTY LIOR RON IN SUPPORT OF OPPOSITION TO MOTION TO COMPEL (DKT. NO. 682). In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that each listed counsel above has concurred in this filing.

/s/ Neel Chatterjee
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CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing with the Clerk of the Court for the United States District Court for the Northern District of California by using the CM/ECF system on June 27, 2017. I further certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

I certify under penalty of perjury that the foregoing is true and correct. Executed this 27th day of June 2017.

/s/ Neel Chatterjee
NEEL CHATTERJEE